

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERNESTO SANTIAGO)	C.A. No. 04-335 Erie
)	(Judge Sean J. McLaughlin/
)	Magistrate Judge Susan Baxter)
Plaintiff)	
)	ELECTRONICALLY FILED PLEADING
vs.)	
)	PLAINTIFF'S MOTION FOR
UNITED STATES OF AMERICA)	EXTENSION TO SUBMIT EXPERT
)	REPORT
)	
)	Filed on behalf of:
Defendant)	Plaintiff, Ernesto Santiago
)	
)	Counsel of record for this party:
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PLAINTIFF'S MOTION FOR EXTENSION TO SUBMIT EXPERT REPORT

Plaintiff, Ernesto Santiago, through his counsel, Knox McLaughlin Gornall & Sennett, P.C., files the following Motion for Extension to Submit Expert Report and states in support as follows:

1. Undersigned counsel has entered his Appearance on behalf of plaintiff, Ernesto Santiago, and agreed to assist him in procuring an expert analysis and report concerning any deviation from the appropriate standard of care relative to the medical treatment that plaintiff received while he was incarcerated.

2. On January 5, 2006, the Court entered an Order setting a deadline for the submission of expert reports by March 6, 2006.

3. Since January 5, 2006, the undersigned counsel has consulted multiple medical experts concerning their availability to review plaintiff's case.

4. Certain experts have been unable to undertake the review due to schedule conflicts and limitations.

5. Plaintiff's counsel has consulted an expert who believes he can provide an assessment by early April, 2005.

6. Plaintiff's counsel requires additional time to obtain expert review and a report concerning plaintiff's medical treatment.

7. Plaintiff's counsel believes that expert review of this matter should be complete by April 15, 2006.

WHEREFORE, plaintiff respectfully requests that the Court extend the deadline for the submission of expert reports until April 16, 2006.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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